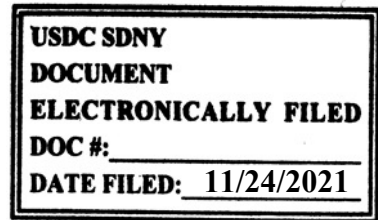




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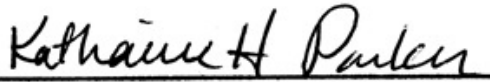
24 November 2021

Honorable Katherine H. Parker
U.S. Magistrate Judge
Southern District of New York
Daniel Patrick Moynahan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Williams v. Saul*, 20 CV 10504 (KHP)

Dear Judge Parker:

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.
11/24/2021

I represent the Plaintiff, Lisa Williams, in this Social Security appeal of a dismissal of her case. I write now to respectfully request an second extension of time to file Plaintiff's motion for judgment on the pleadings. Defendant's counsel consents to this request.

Previously in this case, the Commissioner filed the certified administrative transcript on August 19, 2021 (Dkt. 21). On October 13, 2021, Plaintiff filed a request on consent for an extension of time. Dkt. 22. This was granted. Dkt. 23. Plaintiff's motion is currently due December 2, 2021. Plaintiff now requests an additional 45 days for the filing of her motion.

Plaintiff makes this request for several reasons. First, the parties ask for more time to consider a stipulated resolution of this case, and this is taking more time than anticipated due in part to Defendant's very high case load. Second, Plaintiff's counsel has pursued additional medical records as part of its representation, which have been shared with Defendant's counsel. Material records from January 2020, a little over a week after this case was dismissed by an administrative law judge, have been delayed by the medical provider despite the Urban Justice Center's multiple and determined efforts to secure the records. At this writing, we hope to have the records in full by December 3, 2020. Third, the additional time will allow Defendant to look into a supplemental filing of the full administrative record, as the parties have discussed. The transcript filed in August is an abbreviated version focusing on procedural documents, which means the medical and related nonmedical documents are not included. In the event

that this matter is not resolved by stipulation, a fuller administrative record will be relevant. Finally, the Urban Justice Center is closed December 24-January 3, and I have a family vacation scheduled which I hope to honor.

The parties are aware that this action has been delayed several times. We are pursuing several issues at the same time now in order to prevent further delays. In addition, Defendant consents to reduce her time to file her motion or responsive papers to 30 days.

Therefore, I respectfully request an extension of time for the filing of Plaintiff's motion and brief for 45 days, to Tuesday, January 18, 2022. The Commissioner's time to file the cross motion and brief would be extended to 30 days after that, or on or before Thursday, February 17, 2022.

Thank you for considering this request.

Sincerely,

/s/

Ann P. Biddle
Litigation Supervisor
Mental Health Project

cc: Amanda F. Parsels
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Filed via ECF